

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA, §  
*ex rel. ALEX DOE, RELATOR, et al.* §  
§  
*Plaintiffs,* §  
v. §  
§ Civil Action No. 2-21-CV-022-Z  
PLANNED PARENTHOOD FEDERATION §  
OF AMERICA, INC., *et al.* §  
§  
*Defendants.* §

**STATE OF TEXAS'S MOTION TO WITHDRAW COUNSEL AND  
DESIGNATION OF ATTORNEY IN CHARGE**

The State of Texas respectfully files this Motion to Withdraw Counsel and Designation of Attorney in Charge and in support shows the following:

1. Current lead counsel of record is Christopher D. Hilton, formerly the Chief of the General Litigation Division. Mr. Hilton is no longer employed by the Office of Attorney General.
2. Amy S. Hilton, Special Counsel with the Special Litigation Division, has been assigned as Attorney in Charge to represent the State of Texas in this cause. Ms. Hilton is counsel of record in this case, familiar with this matter, and prepared to assume the duties of lead counsel.

WHEREFORE, PREMISES CONSIDERED, the State respectfully requests that this Court permit Christopher D. Hilton to withdraw as Counsel of Record and to designate Amy S. Hilton as Attorney in Charge for the State of Texas in the above-styled and numbered cause of action.

Dated October 23, 2023

**KEN PAXTON**  
Attorney General

**BRENT WEBSTER**  
First Assistant Attorney General

**GRANT DORFMAN**  
Deputy First Assistant Attorney General

**RALPH MOLINA**  
Deputy Attorney General for Legal Strategy

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Respectfully submitted,

**RYAN D. WALTERS**  
Chief, Special Litigation Division

*/s/ Amy S. Hilton*  
**AMY S. HILTON**  
Attorney-in-Charge  
Special Counsel  
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**COUNSEL FOR STATE OF TEXAS**

**CERTIFICATE OF CONFERENCE**

I certify that counsel for the State of Texas has conferred with all counsel of record and all counsel are unopposed to this motion.

*/s/ Amy S. Hilton*  
**AMY S. HILTON**

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on October 23, 2023, and that all counsel of record were served by CM/ECF.

*/s/ Amy S. Hilton*  
**AMY S. HILTON**